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IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MICHAEL GRECCO
PRODUCTIONS, INC.,

Plaintiff,

v.

TIKTOK, INC.,

Defendant.

Civil Action No. 2:24-cv-04837-FLA-MAR

**RENEWED STIPULATION TO
EXTEND BRIEFING SCHEDULE
AND CONTINUE HEARING DATE
FOR DEFENDANT’S MOTION TO
DISMISS [DKT 24]**

Current Hearing Date: October 4, 2024

New Hearing Date: October 18, 2024

Plaintiff Michael Grecco Productions, Inc. (“Plaintiff”) and Defendant TikTok Inc. (“Defendant”) stipulate and respectfully request that the Court extend the time for Plaintiff to file a Response to Defendant’s Motion to Dismiss by seven (7) days, Defendant’s Reply to Plaintiff’s Response by seven (7) days, and continue the hearing on Defendant’s Motion to Dismiss by fourteen (14) days, and state as follows:

1 1. On June 7, 2024, Plaintiff filed its Complaint in this action. See D.E.
2 1.

3 2. On August 15, 2024, Plaintiff filed its First Amended Complaint. See
4 D.E. 23.

5 3. On August 29, 2024, Defendant filed its Motion to Dismiss, noting
6 the hearing for October 4, 2024, at 1:30 pm. Making Plaintiff's Response to the
7 Motion to Dismiss due September 13, 2024 and Defendant's Reply in Support of
8 the Motion to Dismiss due September 20, 2024. See D.E. 24.

9 4. On September 12, 2024, Plaintiff requested that Defendant stipulate
10 to a seven (7) day extension of time for Plaintiff to respond to the Motion to
11 Dismiss and Defendant agreed if Plaintiff grant it an additional seven (7) days for
12 its Reply brief.

13 5. Whereas, Plaintiff and Defendant stipulate to a seven (7) day
14 extension of time for Plaintiff to respond and a seven (7) day extension of time to
15 the period for Defendant to file its Reply, making Plaintiff's Response to the
16 Motion to Dismiss due on September 20, 2024 and Defendants' Reply due on
17 October 4, 2024.

18 6. Additionally, to accommodate the stipulated briefing schedule,
19 Plaintiff and Defendant stipulate and request that the Court continue the hearing
20 date for Defendant's Motion to Dismiss to October 18, 2024 (or as soon thereafter
21 as the Court's schedule allows).

22 7. This stipulation and requested extension of time is being made in good
23 faith.

24 **WHEREFORE**, Plaintiff and Defendant agree to, and respectfully requests
25 that the Court grant this stipulation and continue the hearing on Defendant's
 Motion to Dismiss.

LOCAL RULE 7.3 CERTIFICATE

Before filing this Request, undersigned counsel conferred with counsel for Defendant (Connor J. Hansen, Esq.) who indicated that he agrees to the requested relief, therefore, Defendant does not oppose this request.

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By: /s/ Lauren M. Hausman
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3 *Attorneys for Defendant*

4 By: /s/ Connor J. Hansen

5 Connor J. Hansen (*pro hac vice*)

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8 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filing party hereby attests that
9 all signatories listed, and on whose behalf the filing is submitted concur in the
10 filing's content and have authorized this filing.

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13 **CERTIFICATE OF SERVICE**

14 I hereby certify that on September 17, 2024, I electronically filed the
15 foregoing document with the Clerk of the Court using CM/ECF, which will
16 electronically serve all counsel of record.

17 /s/ Lauren M. Hausman

18 Lauren M. Hausman, Esq.